

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,)
)
 Plaintiff,) No. CR 15-4268-18 JB
) No. CR 16-1613-10 JB
 vs.)
)
 DANIEL SANCHEZ, and)
 RUDY PEREZ,)
)
 Defendants.)

UNITED STATES' UNOPPOSED MOTION TO EXCEED THE 24-PAGE LIMIT FOR ITS RESPONSE IN OPPOSITION TO DEFENDANT DANIEL SANCHEZ'S MOTION TO COMPEL THE GOVERNMENT TO REVEAL THE IDENTITY OF CERTAIN CONFIDENTIAL INFORMANTS REFERENCED IN DISCOVERY MATERIALS [No. CR 15-4268, Doc. 815; No. CR 16-1613, Doc. 285], DEFENDANT RUDY PEREZ'S NOTICE OF JOINDER IN DEFENDANT DANIEL SANCHEZ'S MOTION TO COMPEL [No. CR 15-4268, Doc. 831], AND DEFENDANT RUDY PEREZ'S NOTICE OF JOINDER IN DEFENDANT CHRIS GARCIA'S SUPPLEMENTAL BRIEF IN SUPPORT OF OPPOSED MOTION TO COMPEL THE IDENTIFICATION OF CONFIDENTIAL INFORMANTS [No. CR 15-4268, Doc. 828]

The United States of America moves the Court to extend the 24-page limit for its response to Defendant Daniel Sanchez's Motion to Compel the Government to Reveal the Identity of Certain Confidential Informants Referenced in Discovery Materials [No. Cr 15-4268, Doc. 815; No. Cr 16-1613, Doc. 285], Defendant Rudy Perez's Notice of Joinder in Defendant Daniel Sanchez's Motion to Compel [No. Cr 15-4268, Doc. 831], and Defendant Rudy Perez's Notice of Joinder in Defendant Chris Garcia's Supplemental Brief in Support of Opposed Motion to Compel the Identification of Confidential Informants [No. Cr 15-4268, Doc. 828], under the United States District Court for the District of New Mexico's Local Criminal Rule 47.9. The United States, under D.N.M.LR-Cr. 47.1, contacted Defendants Daniel Sanchez and Rudy Perez's counsel; they do not oppose. Additionally, Counsel for co-Defendants do not oppose this motion.¹

¹ The United States sent an email asking all counsel to respond with opposition by noon, January 23, 2017,

The United States requests the Court's leave to file its response in excess of the 24-page limit, because of the complexity of the case, and because, for 30 confidential informants, the United States needs to address the analysis concerning disclosure the identity of confidential informants under the Government's informant privilege that the United States Supreme Court articulated in Roviaro v. United States, 353 U.S. 53 (1957).

WHEREFORE, for the foregoing reasons, the United States of America respectfully requests that this Court grant the United States' unopposed motion for the Court's leave to file its response to Defendant Daniel Sanchez's Motion to Compel the Government to Reveal the Identity of Certain Confidential Informants Referenced in Discovery Materials [No. Cr 15-4268, Doc. 815; No. Cr 16-1613, Doc. 285], Defendant Rudy Perez's Notice of Joinder in Defendant Daniel Sanchez's Motion to Compel [No. Cr 15-4268, Doc. 831], and Defendant Rudy Perez's Notice of Joinder in Defendant Chris Garcia's Supplemental Brief in Support of Opposed Motion to Compel the Identification of Confidential Informants [No. Cr 15-4268, Doc. 828], in excess of the 24-page limit set by Local Criminal Rules.

Respectfully Submitted,

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Electronically filed on 1/30/17
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or the United States would assume there was no opposition. Counsel either responded that they did not oppose this extension, or did not respond.

I HEREBY CERTIFY that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send electronic notification to defense counsel of record on this date.

/s/

MATTHEW M. BECK
Assistant United States Attorney